

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	No. 1:14-CV-254
v.)	
)	
UNITED STATES OF AMERICA, <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS' UNOPPOSED MOTION TO FILE EXCESS PAGES

In connection with the Court's Order of June 7, 2016, *see* ECF No. 364, Defendants hereby move for, and respectfully request, leave to file a fifty-one page Response. Pursuant to Local Rule 7.1(D), Defendants aver that their counsel conferred with counsel for Plaintiffs, who do not oppose this motion. Defendants' counsel also conferred with counsel for the Intervenor, who also do not oppose this motion.

The Court's June 7 Order provided the Government an opportunity "to file any submission they wish as to an appropriate sanction for the misrepresentations which were the subject of this Court's May 19, 2016 order and/or any evidence they may have concerning the misrepresentations discussed in that order." ECF No. 364. Defendants responded to the Court's June 7 Order by filing a Response memorandum and submitting a significant amount of factual information—*i.e.*, ten declarations from attorneys involved in the Government's defense of this case. Defendants' Response memorandum is fifty-one pages. Accordingly, Defendants respectfully seek leave to file the Response with thirty-one excess pages. These thirty-one excess pages are necessary for Defendants to fully address the topics set forth in the Court's June 7 Order.

For the foregoing reasons, and with no opposition from Plaintiffs or Intervenor,
Defendants respectfully request leave to file a fifty-one page Response to the Court's
Order of June 7, 2016.

Dated: August 1, 2016

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Unopposed Motion to File Excess Pages has been delivered electronically on August 1, 2016, to counsel of record via the District's ECF system.

/s/ Daniel Schwei
Counsel for Defendants